

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

TPC GROUP INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 22-10493 (CTG)

Jointly Administered

BAYSIDE CAPITAL, INC. and CERBERUS
CAPITAL MANAGEMENT, L.P.,

Plaintiffs,

v.

TPC GROUP INC.,

Defendant.

Adv. Pro. No. 22-50372 (CTG)

**AMENDED² NOTICE OF AGENDA FOR VIDEOCONFERENCE HEARING
SCHEDULED FOR JUNE 10, 2022, AT 3:00 P.M. (E.T.)**

This remote hearing will be conducted entirely over Zoom and requires all participants to register in advance. Please register by June 9, 2022, at 4:00 p.m. Eastern Time.

COURTCALL WILL NOT BE USED FOR THIS HEARING.

Please use the following link to register for this hearing:

<https://debuscourts.zoomgov.com/meeting/register/vJltcuCpqzMpHm701RK5Thy4jEyQ7lfJICg>

After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: TPC Group Inc. (3618); TPC Holdings, Inc. (7380); TPC Group LLC (8313); Texas Butylene Chemical Corporation (7440); Texas Olefins Domestic International Sales Corporation (4241); TPC Phoenix Fuels LLC (9133); Port Neches Fuels, LLC (1641); and TP Capital Corp. (6248). Each Debtor's corporate headquarters and mailing address is 500 Dallas St., Suite 2000, Houston, Texas 77002.

² Amended items appear in **bold**.

**YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM OR
YOU WILL NOT BE ALLOWED INTO THE MEETING.**

Topic: TPC Group, Inc.

Time: June 10, 2022 at 3:00 PM Eastern Time (US and Canada)

MATTERS GOING FORWARD

1. [SEALED] Debtors' Motion for Entry of an Order (I) Approving the Debtors' Assumption of Commercial Contracts, as Amended, and (II) Granting Related Relief ([D.I. 49](#), filed 06/01/22).

Objection Deadline: At, or before, the hearing.

Objections/Responses Received:

a) Informal comments from the U.S. Trustee.

Related Pleadings:

- a) Notice of Filing of Proposed Redacted Version of Debtors' Motion for Entry of an Order (I) Approving the Debtors' Assumption of Commercial Contracts, as Amended, and (II) Granting Related Relief ([D.I. 54](#), filed 06/01/22);
- b) Motion to File Under Seal Debtors' Motion for Entry of an Order (I) Approving the Debtors' Assumption of Commercial Contracts, as Amended, and (II) Granting Related Relief ([D.I. 55](#), filed 06/01/22);
- c) Order Shortening Notice of Debtors' Motion for Entry of an Order (I) Approving the Debtors' Assumption of Commercial Contracts, as Amended, and (II) Granting Related Relief ([D.I. 162](#), entered 06/06/22); **and**
- d) **Supplemental Declaration of Robert A. Del Genio in Support of Debtors' Motion for Entry of an Order (I) Approving the Debtors' Assumption of Commercial Contracts, as Amended, and (II) Granting Related Relief ([D.I. 180](#), filed 6/9/22) (the "Supplemental Declaration").**

Status: This matter is going forward. The Debtors have resolved the U.S. Trustee's informal comments by filing the Supplemental Declaration. The Ad Hoc Noteholder Group, GLAS Americas LLC, GLAS USA LLC, Eclipse Business Capital LLC, and the TPC Group Litigation Plaintiffs do not object to entry of a final order approving the motion. In the event the Debtors receive additional responses or objections to the motion such that an evidentiary hearing is necessary, the Debtors reserve the right to call Robert A. Del Genio to testify in support of the motion.

ADVERSARY PROCEEDING:

Bayside Capital Inc., et al. v. TPC Group Inc., Adv. Pro. No. 22-50372

2. Letter to the Honorable Craig T. Goldblatt from Robert J. Dehney Regarding Discovery Dispute ([A.D.I. 14](#), filed 06/09/22).³

Objections/Responses Received:

- a) Letter to the Honorable Craig T. Goldblatt from Bayside Capital, Inc. and Cerberus Capital Management, L.P. Regarding Discovery Dispute (to be filed before the hearing).

Related Pleadings: None.

Status: This matter is going forward. Please take notice that at the direction of the Court, a discovery conference regarding a discovery dispute will take place after the hearing on the motion.

³

This letter was also filed under the main bankruptcy docket at [D.I. 179](#).

Dated: June 9, 2022
Wilmington, Delaware

BAKER BOTTS L.L.P.

James R. Prince (admitted *pro hac vice*)
Kevin Chiu (admitted *pro hac vice*)
2001 Ross Avenue, Suite 900
Dallas, Texas 75201-2980
Telephone: (214) 953-6500
Facsimile: (214) 953-6503
Email: jim.prince@bakerbotts.com
kevin.chiu@bakerbotts.com

-and-

BAKER BOTTS L.L.P.

Scott R. Bowling (admitted *pro hac vice*)
30 Rockefeller Plaza
New York, New York 10112
Telephone: (212) 408-2500
Facsimile: (212) 259-2501
Email: scott.bowling@bakerbotts.com

-and-

BAKER BOTTS L.L.P.

David R. Eastlake (admitted *pro hac vice*)
Lauren N. Randle (admitted *pro hac vice*)
910 Louisiana Street
Houston, Texas 77002
Telephone: (713) 229-1234
Facsimile: (713) 229-1522
Email: david.eastlake@bakerbotts.com
lauren.randle@bakerbotts.com

/s/ Brian Loughnane

**MORRIS, NICHOLS, ARSHT & TUNNELL
LLP**

Robert J. Dehney (No. 3578)
Curtis S. Miller (No. 4583)
Daniel B. Butz (No. 4227)
Matthew O. Talmo (No. 6333)
Brian Loughnane (No. 6853)
1201 N. Market Street, 16th Floor
P.O. Box 1347
Wilmington, Delaware 19899-1347
Telephone: (302) 658-9200
Facsimile: (302) 658-3989
Email: rdehney@morrisnichols.com
cmiller@morrisnichols.com
dbutz@morrisnichols.com
mtalmo@morrisnichols.com
bloughnane@morrisnichols.com

*Proposed Attorneys for Debtors
and Debtors in Possession*